

**REMARKS**

Claims 36-72 and 74 are pending in this application. Claims 1-35 have been cancelled previously. Claims 73, 75-79 were withdrawn from further consideration without disclaimer or prejudice. By this Response, claims 52 and 67 have been canceled. Claims 36, 44-45, 51, 58, 60-63, 65, 68-69, and 74 have been amended. The amendment made to the claims are fully supported by the specification as originally filed. No new matter has been introduced. The Applicants hereby respectfully distinguish the claimed subject matter from the cited prior art. Reconsideration of this application for allowance of all pending claims are hereby respectfully requested in view of the following remarks.

**Claims Rejected Under 35 U.S.C § 103(a)**

Claims 36-60, 62-72 and 74 have been rejected under 35 U.S.C. §103(a) as being unpatentable over the Levin reference in view of Levin admitted prior art (APA). The Applicants respectfully traverse the rejection.

The Applicants respectfully point out that the assertions made in the Office Action are not correct. It appears that the Examiner equated each translatable component with a dictionary entry, which is not appropriate. To clarify, the Applicants amended the claim language to recite “each segment of text is translated as a unit” in order to better distinguish the claimed invention from the cited prior art. Furthermore, in the Office Action, the Examiner equated a linguist with a human translator. See OA, page 3. The Examiner indicated that “linguist corresponds to the human”. The Applicants respectfully disagree and point out that such a mapping is not appropriate. As the amended claims recited, a translatable component is a segment of text, which is not a dictionary entry. In addition, a linguist according to Levin is clearly not a human translator. As evidenced on page 46, Levin unmistakably describes a linguist as a person “to

create and modify morphological rules, phrase structure rules, and transfer rules for the sub-language dictionary". Those are not the functions performed by a human translator and none of those described functions actually correspond to translation activities. Therefore, the Applicants respectfully submit that reading a linguist, under Levin, on a human translator, as claimed, is not correct.

In addition, the amended independent claims 36, 63, and 74 recite "dividing the content in the first language into a plurality of translatable components" and "scheduling for translation of translatable components that do not have corresponding translations in the database and using a human translator to translate each translatable component into the second language, wherein each segment of text is translated as a unit". The Applicants respectfully point out that neither Levin nor APA teaches these claimed features. In addition, the amended independent claims 36, 63, and 74 recite a process in which translated components produced by a human translator based on the content in a first language are stored in a database and used, in the future, for modifying the content in a first language when a second request is received for the same translated content so that there is no need for re-translation. These features are also not present in Levin and APA.

It is well settled that to establish a *prima facie* case of obviousness against a claim, the cited prior references, either alone or in combination, must teach each and every feature recited in the claim. Since claims 36, 63, and 74 recite features that are not taught by either Levin or APA, no *prima facie* case of obviousness has been established. Thus, independent claims 36, 63, and 74 are not obvious over Levin in view of APA. Therefore, the Applicants respectfully request that rejection of claims 36, 63, and 74 under 35 U.S.C. §103 (a) be withdrawn.

Claims 37-60, 62, 64-72 depend from claims 36 and 63, respectively. Thus, they are not obvious over Levin in view of APA for at least the same reasons as discussed with respect to

claims 36 and 63, respectively, and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claims 36-60, 62-72 and 74 35 U.S.C. §103(a) be withdrawn.

Claim 61 has been rejected under 35 U.S.C. §103(a) as being unpatentable over US Publication 2004/0102956 (Levin) as applied to claims 36-51, 53-55, 57-66, 68-70, 72 and 74 above, and further in view of US Publication 2003/0187587 (Swindells et al.) filed March 14, 2007. The Applicants respectfully traverse.

As discussed above, claim 36 recites features that are not taught or suggested by Levin. The Applicants respectfully submit that Swindells et al. do not disclose or suggest those claimed features, either, and thus can not remedy the deficiencies of Levin. That is, claim 36 is not obvious over Levin in view of Swindells et al. Claim 61 depends from claim 36. Therefore, claim 61 is not obvious over Levin in view of Swindells et al. for at least the same reasons as discussed with respect to claim 36 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claim 61 35 U.S.C. §103(a) be withdrawn.

### **Conclusion**

The Applicants have addressed all rejections/objection raised by the Examiner. Accordingly, it is believed that all pending claims are now in condition for allowance. Applicants therefore respectfully request an early and favorable reconsideration and allowance of this application. If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicants' representative at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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